

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
NICHOLAS DANE TYSON :
Debtor : CHAPTER 13
:
JACK N. ZAHAROPOULOS :
STANDING CHAPTER 13 TRUSTEE :
Movant : CASE NO. 1-25-bk-01200
:
NICHOLAS DANE TYSON :
Respondent :
:

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 5th day of June 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced Debtor(s)' Plan for the following reason(s):

1. Debtor has not demonstrated that all tax returns have been filed as required by §1325(a)(9), specifically 2021 through 2024 returns, per testimony of Debtor.
2. Trustee avers that Debtor(s)' Plan cannot be administered due to the lack of the following:
 - a. Debtor(s) has not provided to Trustee copies of the 2024 federal income tax returns as required by §521(e)(2)(A).
 - b. Debtor(s) has not provided to Trustee pay stubs for the month(s) of April and May 2025.

WHEREFORE, Trustee alleges and avers that Debtor(s)' Plan cannot be confirmed, and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of Debtor(s)' Plan.
- b. Dismiss or convert Debtor(s)' case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 5th day of June 2025, I hereby certify that I have served the within Objection by electronically notifying all parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

PAUL MURPHY-AHLES ESQUIRE
DETHLEFS, PYKOSH & MURPHY
2132 MARKET STREET
CAMP HILL, PA 17011-

/s/Tammy Life
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee